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VIA ELECTRONIC SUBMISSION

Elizabeth Bowles, Chair Broadband Deployment Advisory Committee Federal Communications Commission 445 12th St., S.W. Washington, D.C. 20554

Dear Secretary Dortch and Chair Bowles:

On behalf of the cities of Bellevue, Bothell, Burien, Ellensburg, Gig Harbor, Kirkland, Mountlake Terrace, Mukilteo, Normandy Park, Puyallup, Redmond and Walla Walla, all within Washington State, we write to submit for the Broadband Deployment Advisory Committee's consideration filings made on those cities behalf in the following recent and related dockets:

- Accelerating Wireline Broadband Deployment, WC Docket No. 17-84,
- Accelerating Wireless Broadband Deployment, WT Docket No. 17-79, and
- Mobilitie, LLC Petition for Declaratory Ruling, WT Docket No. 16-421.

Over the past two years the cities have worked in cooperation with the wireless industry to streamline small cell deployment by adopting codes specific to small cell deployment, franchise ordinances, and educating planning commissions and city councils on the benefits of small cell technology. We hope that the work of the BDAC does not derail these initiatives and instead encourages this cooperation. Specifically, we ask that the BDAC and the Commission:

- 1. Allow municipalities to determine appropriate compensation for the use of municipal-owned poles and infrastructure, consistent with fair market value, costs associated make-ready work, and state constitutional law;
- 2. Not impose new shot clocks or deemed granted remedies on wireless siting;
- 3. Refrain from further interpreting the application of Section 253 and Section 332; and
- 4. Exercise restraint when considering preemption of local laws, as it can derail years of city planning and development and change the cooperative dynamic we current enjoy with the wireless industry.

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We appreciate your service and the service of the members of the BDAC. We hope that the BDAC's recommendations remain within the confines of current legal authority and respects the sovereignty of local governments and states.

The Washington cities listed above thank you for the opportunity to submit our comments.

Sincerely,

Elana Zana

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